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*Attorneys for Defendant
J. Michael Pearson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

This Document Relates To:

ALL ACTIONS.

Civil Action No. 3:15-cv-07658-
MAS-LHG

ECF Case

NOTICE OF MOTION FOR PRO
HAC VICE ADMISSION OF
BRUCE YANNETT, JONATHAN
TUTTLE, AND ADA FERNANDEZ
JOHNSON

PLEASE TAKE NOTICE that on May 15, 2017, or as soon thereafter as counsel may be heard, the undersigned, counsel for Defendant J. Michael Pearson, shall move pursuant to Local Civil Rule 7.1 before the Honorable Lois H. Goodman, U.S.M.J., United States District Court, District of New Jersey, at the Courthouse located at 402 East State Street, Trenton, New Jersey 08608, for an Order admitting Bruce Yannett, Jonathan Tuttle, and Ada Fernandez Johnson, of the law firm of Debevoise & Plimpton LLP, to appear before this Court pro hac vice for the purpose of acting as counsel to Defendant J. Michael Pearson in this action.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant J. Michael Pearson shall rely upon the annexed Declarations of Bruce Yannett, Jonathan Tuttle, Ada Fernandez Johnson, and Holly S. Wintermute.

It is respectfully requested that the Court rule upon this Motion, without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

Pursuant to Local Civil Rule 7.1(d)(4), Defendant submits this statement in lieu of a submission of a formal brief. It is respectfully submitted that no brief in support of this Motion is necessary because the pro hac vice admission of Bruce Yannett, Jonathan Tuttle, and Ada Fernandez Johnson under Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and Defendant has submitted with this Motion Declarations of Bruce Yannett, Jonathan Tuttle, Ada Fernandez Johnson, and Holly S. Wintermute in support of the admission.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: New York, New York
April 11, 2017

DEBEVOISE & PLIMPTON LLP
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